

Battaglia, Frank

From: Battaglia, Frank [battaglia.frank@epa.gov]
Sent: Tuesday, June 11, 2013 5:11 PM
To: Lynch, Joanne; Joseph Guarnaccia
Cc: Hellerich, Lucas; Battaglia, Frank
Subject: RE: BASF Cranston RI - SRI Workplan Addendum, Response to EPA Comments

Joe/Joanne, as I explained to Joanne earlier today, I spoke with Kim Tisa about the 30mg/kg action level and we believe that this action level should be changed to 25 mg/kg in order to better follow the TSCA low occupancy use clean up levels for PCBs.

If you agree with this change and since this is the only unresolved EPA comment, I approve the sampling plan with the condition that the action level be changed to 25 mg/kg. Please respond to this e-mail and make this change in the final Addendum to the Supplemental Remedial Investigation Work Plan that you submit to EPA and attach this e-mail to the plan. Mobilization can begin as soon as possible.

If you would like to discuss further, I will be back in the office on Monday June 17, 2013. I will be on furlough the rest of this week. Thanks for all your effort in cleaning up this site.

Frank Battaglia
617 918-1362

From: Lynch, Joanne [mailto:Joanne.Lynch@aecom.com]
Sent: Thursday, June 06, 2013 3:57 PM
To: Battaglia, Frank
Cc: Joseph Guarnaccia; Hellerich, Lucas
Subject: BASF Cranston RI - SRI Workplan Addendum, Response to EPA Comments

Frank –

The following is a response to your comment regarding the Supplemental Remedial Investigation (SRI) Workplan Addendum (5/6/2013), that we discussed by phone on Thursday, May 30.

EPA Comment

Please provide more discussion about how a 30 mg/kg action level was determined.

AECOM Response

The SRI Workplan text and decision matrix (in Table 1) describes the use of 30 mg/kg as a decision point to determine if deeper or abutting soil grid samples on hold should be activated for analysis at River Areas 1, 2, and 3, and Central Areas 1, 2, and 3. Our intent is to consider the conceptual site model, wherein releases at surface caused PCB impacts in soil, while evaluating the soil data to ensure that the data support the release history. Specifically, if total PCB concentrations in soil are decreasing with depth then we would conclude that that is consistent with the CSM. However, if we find that PCB soil concentrations increase with depth, even if under 30 mg/kg then this would be inconsistent with a surface release and an additional sample(s) would be analyzed to characterize the extent of the PCB impacts and determine if an alternate CSM fit that area better (i.e., a specific historical operation in that area caused a subsurface release). Selecting 30 mg/kg as a vertical delineation decision point, while considering the CSM, will enable us to confirm the depth of soil that needs to be removed (i.e., the vertical extent of soil >50 mg/kg) as well as adequately delineate the future capped area.

AECOM Note

On May 30, 2013, we discussed the possibility of using field screening techniques for the soil samples. BASF has decided to rely solely on analytical data, as described in the SRI Workplan Addendum.

Schedule



We are tentatively scheduling field work to begin on 6/24 and run through approximately 7/10. PCB soil sampling will proceed first and will be following by the groundwater grab and monitoring well sampling.

Thank you for your attention to this matter. With your approval, we will finalize our subs and field staff.

Best regards,
Joanne Lynch

Joanne M. Lynch, M.Sc., P.Eng.
Environmental Engineer
D 978.905.2296
C 978.496.0589
joanne.lynnch@aecom.com



250 Apollo Drive, Chelmsford, MA 01824
T 978.905.2100 F 978.905.2101
www.aecom.com

This electronic communication, which includes any files or attachments thereto, contains proprietary or confidential information and may be privileged and otherwise protected under copyright or other applicable intellectual property laws. All information contained in this electronic communication is solely for the use of the individual(s) or entity to which it was addressed. If you are not the intended recipient(s), you are hereby notified that distributing, copying, or in any way disclosing any of the information in this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately, and destroy the communication and any files or attachments in their entirety, whether in electronic or hard copy format. Since data stored on electronic media can deteriorate, be translated or modified, AECOM, its subsidiaries, and/or affiliates will not be liable for the completeness, correctness or readability of the electronic data. The electronic data should be verified against the hard copy.

Please consider the environment before printing this e-mail.